IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

AMBER WNEK, : CIVIL ACTION

Plaintiff

.

v. : NO. 1:13-cv-00925-JEJ

.

INTEGRITY FINANCIAL PARTNERS, INC., : JURY TRIAL
Defendant : DEMANDED

DEFENDANT INTEGRITY FINANCIAL PARTNERS, INC.'S MOTION FOR SUMMARY JUDGMENT

Defendant Integrity Solution Services, Inc. f/k/a Integrity Financial Partners, Inc. ("Integrity") by and through undersigned counsel, hereby moves this Court for summary judgment pursuant to Federal Rule of Civil Procedure 56 against Plaintiff on all claims. For the reasons set forth in Integrity's accompanying Memorandum in Support of its Motion for Summary Judgment, filed contemporaneously herewith, which Integrity adopts and incorporates herein, Integrity is entitled to, and requests, summary judgment in its favor and against Plaintiff.

This Motion is accompanied by a statement of facts pursuant to L.R. 56.1, and a Brief in Support of Motion for Summary Judgment (hereinafter "Brief in Support") has been filed contemporaneously with this Motion pursuant to L.R. 7.5.

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Respectfully submitted,

FINEMAN KREKSTEIN & HARRIS, P.C.

By: /s/ Richard J. Perr

RICHARD J. PERR, ESQUIRE (PA 72883)

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CERTIFICATE OF NONCONCURRENCE

The undersigned sought concurrence in the motion from counsel for Plaintiff. Counsel for plaintiff does not concur with Defendant Integrity Financial Partners, Inc.'s Motion for Summary Judgment.

FINEMAN KREKSTEIN & HARRIS, P.C.

By: /s/ Richard J. Perr

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Attorneys for Defendant

Dated: November 1, 2013

CERTIFICATE OF SERVICE

I, RICHARD J. PERR, ESQUIRE, hereby certify that on or about this date, I served a true and correct copy of the foregoing electronically, or by first class mail, postage prepaid, or telecopy on the following:

Brent F. Vullings, Esquire Vullings Law Group, LLC 3953 Ridge Pike, Suite 102 Collegeville, PA 19426 (v) 610-489-6060; (f) 610-489-1997 bvullings@vullingslaw.com Attorneys for Plaintiff

> /S/ Richard J. Perr RICHARD J. PERR, ESQUIRE

Dated: November 1, 2013

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